

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 2:16-cr-154
)	
JAMES COYNE,)	
Defendant.)	

**SECOND UNOPPOSED MOTION TO ENLARGE TIME TO RESPOND TO
DEFENDANT'S MOTION TO SUPPRESS EVIDENCE AND STATEMENTS**

The United States of America, by and through its attorney, Eugenia A. P. Cowles, Acting United States Attorney for the District of Vermont, hereby moves to enlarge by one week the time to respond to the defendant's Motion to Suppress, filed May 17, 2017. The government's response to the Motion is currently due on June 19, 2017. The proposed enlargement would extend that deadline until June 26, 2017. Defense counsel, Steven Barth, Esq., has advised the undersigned that he does not oppose the government's motion for enlargement of time to respond.

The Motion requires the undersigned to acquire information and affidavits from Microsoft and the National Center for Missing and Exploited Children (NCMEC). It has taken some time to identify the appropriate point of contact. The undersigned is not yet in possession of the requisite affidavits. The undersigned has advised the companies that the new deadline for response may be June 26, 2017 and they have expressed a willingness to comply with that deadline. The government's response should include factual attestations from Microsoft and NCMEC. The relatively modest proposed enlargement would permit the government to provide this Court with as complete and thorough a response as possible to the Motion, while also attending to other matters pending before the Court.

For these reasons, the government respectfully requests that the Court enlarge the time in which the government must file its response until June 26, 2017.

Dated at Burlington, in the District of Vermont, this 16th day of June 2017.

Respectfully submitted,

UNITED STATES OF AMERICA

EUGENIA A. P. COWLES
Acting United States Attorney

By: */s/ Christina Nolan*
CHRISTINA E. NOLAN
Assistant U.S. Attorney
P.O. Box 570
Burlington VT 05402-0570
(802) 951-6725
christina.nolan@usdoj.gov

CERTIFICATE OF SERVICE

I, Liza G. LaBombard, Legal Assistant for the United States Attorney for the District of Vermont, do hereby certify that on June 16, 2017, I electronically filed the Government's

SECOND UNOPPOSED MOTION TO ENLARGE TIME TO RESPOND TO

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Clerk of the Court using the CM/ECF system.

/s /Liza G. LaBombard

Legal Assistant

District of Vermont

P.O. Box 570

Burlington, VT 05402

(802) 951-6725